

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

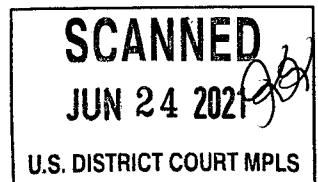
CR 21-147 ADM/TNL

UNITED STATES OF AMERICA,) **INDICTMENT**
Plaintiff,)
v.) 18 U.S.C. § 2
1) SARAH JEAN ELWOOD,) 18 U.S.C. § 371
2) JEFFREY PAUL JACKSON,) 18 U.S.C. § 922(a)(1)(A)
a/k/a "Jay,") 18 U.S.C. § 922(a)(6)
and) 18 U.S.C. § 924(a)(1)(D)
3) GERYIELL LAMONT WALKER,) 18 U.S.C. § 924(a)(2)
a/k/a "Man Man,") 18 U.S.C. § 924(d)(1)
Defendants.) 28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTORY ALLEGATIONS

1. Federal law requires persons engaged in the business of dealing in firearms to be licensed under the provisions of Title 18, Chapter 44, United States Code. Federal law further requires that, prior to the sale of firearms to unlicensed persons, licensed dealers in firearms, also known as Federal Firearms Licensees ("FFLs"), must determine the lawfulness of the sale, maintain proper records of the transaction, and contact the National Instant Criminal Background Check System ("NICS") to determine whether the prospective buyer of the firearms is prohibited by law from purchasing or receiving firearms.



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2. As part of these federal law requirements, before an FFL may lawfully sell a firearm to an unlicensed person, the unlicensed person must fill out, date, and sign a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 – Firearms Transaction Record (“ATF Form 4473”), certifying that all the information provided is “true, correct, and complete.” The information and certification statutorily required by ATF Form 4473 enables FFLs to determine if a firearm may lawfully be sold or transferred to a prospective buyer and puts the prospective buyer on notice of certain legal restrictions on the receipt and possession of firearms.

3. Among the “yes” or “no” questions required to be answered truthfully on ATF Form 4473, is Question 21.a., which provides in pertinent part as follows: “Are you the actual transferee/buyer of the firearm(s) listed on this form . . . ? **Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.**”

4. ATF Form 4473 also requires the prospective buyer of a firearm, by signing and dating the form, to certify and acknowledge the following statements and advisories, which are printed in **bold** type: “I certify that my answers . . . are true, correct, and complete. I have read and understand the Notices, Instructions, and Definitions on ATF Form 4473. I understand that answering ‘yes’ to question 21.a. if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law. . . . I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this

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transaction, is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I further understand that the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a Federal firearms license is a violation of Federal law.”

5. Among the Notices, Instructions, and Definitions that the ATF Form 4473 directs the prospective buyer to read is the “Transferee/Buyer Certification,” contained on page 5 of the form, referencing the signature and certification date box. That provision states, in part, that “it is unlawful for a person to engage in the business of dealing in firearms without a license,” and it explains and provides the Federal statutory provisions of when a “person is engaged in the business of dealing in firearms.”

6. At times material to this Indictment, defendant **SARAH JEAN ELWOOD**, was not a licensed dealer in firearms within the meaning of Title 18, Chapter 44, United States Code.

7. At times material to this Indictment, defendant **JEFFREY PAUL JACKSON**, a/k/a “Jay,” was not a licensed dealer in firearms within the meaning of Title 18, Chapter 44, United States Code.

8. Beginning in or about May 2020, and continuing through in or about May 2021, defendants **SARAH JEAN ELWOOD** and **JEFFREY PAUL JACKSON**, a/k/a “Jay,” engaged in a regular pattern and practice of purchasing and reselling firearms with the predominant intent of obtaining livelihood, profit, and pecuniary gain.

9. During this same period of time, defendants **SARAH JEAN ELWOOD** and **JEFFREY PAUL JACKSON**, a/k/a “Jay,” completed approximately 58 separate

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transactions at approximately 9 different FFLs within the District of Minnesota, during which they purchased approximately 95 firearms, and within a short time sold those firearms, for approximately \$100 profit each, to others, including defendant **GERYIELL LAMONT WALKER**, a/k/a “Man Man.”

10. Among the firearms purchased from the following FFLs and then sold were the following:

Transaction Date	FFL	Firearm
5/4/2020	Bills Circle Pines	FMK 9C1 G2 9mm, serial number BTT0628
5/9/2020	Bills Robbinsdale	Ruger LCP 380 Auto, serial number 372294242
5/13/2020	Bills Circle Pines	Bersa Thunder 380 380 ACP, serial number K05664
5/15/2020	Bills Circle Pines	Springfield XD9 9mm, serial number AT204930
5/18/2020	DK MAGS	Walther Arms PPS 9mm, serial number AX9584
5/25/2020	Bills Robbinsdale	Smith & Wesson M&P 15-22 22, serial number DFS1108
6/20/2020	Mills Fleet Farm	Century Arms TP9SF 9mm, serial number 20BH09180
7/28/2020	Bills Robbinsdale	Smith & Wesson Bodyguard 380 Auto, serial number KFU9590
7/29/2020	Bills Circle Pines	Beretta Nano 9mm, serial number NU164741
		Beretta Nano 9mm, serial number NU164738
		Smith & Wesson Bodyguard 380 Auto, serial number KHN5379
7/30/2020	Mills Fleet Farm	Taurus G2C 9mm, serial number ABD463393
8/1/2020	Bills Circle Pines	Smith & Wesson M&P 9 Shield 9mm, serial number JFC3902
8/11/2020	Bills Circle Pines	Taurus G3C 9mm, serial number ABG711104
8/19/2020	Bills Circle Pines	SCCY CPX-2 9mm, serial number 951556
8/26/2020	Bills Circle Pines	Bersa BP9CC 9mm, serial number K23044
8/27/2020	Bills Robbinsdale	Sarsilmaz B6 9mm, serial number T1102-17E13963
11/12/2020	Bills Robbinsdale	Springfield XD Defender 9mm, serial number BY475673
1/4/2021	Mills Fleet Farm	Taurus Spectrum 380 Auto, serial number 1F033220

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Transaction Date	FFL	Firearm
1/11/2021	Mills Fleet Farm	Taurus PT111G2A 9mm, serial number ABH838724
1/29/2021	Bills Circle Pines	Glock 43X 9mm, serial number BPEN020
1/31/2021	Mills Fleet Farm	Taurus Spectrum 380 ACP, serial number 1F024926
		Taurus Spectrum 380 Auto, serial number 1F033065
3/8/2021	Bills Circle Pines	SCCY CPX-2 9mm, serial number 126399
3/15/2021	Mills Fleet Farm	Springfield XDS 9mm, serial number BA181757
3/26/2021	Bills Circle Pines	Walther Arms CCP 9mm, serial number WK189441
3/27/2021	DK MAGS	Glock 43 9mm, serial number AFLC219
4/3/2021	Bills Circle Pines	Taurus G3C 9mm, serial number ACB590615
4/4/2021	Bills Robbinsdale	Springfield XDM Elite 9mm, serial number BA228357
4/11/2021	Bills Circle Pines	Ruger LCP 380 Auto, serial number 372431109
4/17/2021	Bills Circle Pines	Ruger Security 9 9mm, serial number 384-29927
4/18/2021	Bills Circle Pines	Heckler & Koch VP9 Tactical 9mm, serial number 224-316280
4/19/2021	Bills Circle Pines	Girsan MC28SAT 9mm, serial number T6368-20AV12009
4/30/2021	Bills Circle Pines	FN 503 9mm, serial number CV016628 Glock 44 22, serial number AFGC876
5/1/2021	Mills Fleet Farm	Ruger EC9S 9mm, serial number 459-15215
		Smith & Wesson M&P 9 Shield Plus 9mm, serial number JFY6090
5/4/2021	Bills Circle Pines	FN Five-Seven 5.7x28, serial number 386402164
5/6/2021	Mills Fleet Farm	Glock 19 9mm, serial number BTNN877
		Ruger 5 7 5.7x28, serial number 642-13405
5/7/2021	Bills Robbinsdale	Glock 48 9mm, serial number AFML592
		Glock 48 9mm, serial number BSNU334
		Glock 41 45, serial number AFLX128
		Glock 19 9mm, serial number BTED415
5/10/2021	Bills Circle Pines	Glock 19 9mm, serial number AFKM784
		Springfield Hellcat 9mm, serial number BA241781
5/11/2021	Bills Circle Pines	Glock 19 9mm, serial number AFMK782
5/11/2021	Bills Robbinsdale	Taurus G2C 9mm, serial number ACD780274

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Transaction Date	FFL	Firearm
5/12/2021	Bills Robbinsdale	Taurus G2C 9mm, serial number ACD780224
5/12/2021	Capras	Glock 19 9mm, serial number AFDP856
		Glock 26 9mm, serial number AEZU085
		Glock 19 9mm, serial number AFDP854
		Glock 22 .357 Sig, serial number PTB537
5/12/2021	Mills Fleet Farm	Glock 17 9mm, serial number BTMG955
		Ruger 5 7 5.7x28, serial number 642-12901
5/13/2021	Bills Circle Pines	Taurus G3 9mm, serial number ACD781457
5/13/2021	Capras	Glock 26 9mm, serial number AEXF244
		Glock 27 40, serial number BTSS412
5/16/2021	Modern Sportsman	Glock 23 40 S&W, serial number BTHV443
		Glock 26 9mm, serial number BSMB786
5/17/2021	Bills Circle Pines	SCCY CPX-2 9mm, serial number C124715
		SCCY CPX-2 9mm, serial number C124587
5/17/2021	Modern Sportsman	Glock 19 9mm, serial number BTCV605
		Glock 22 40 S&W, serial number BTEN439
		Ruger EC9S 9mm, serial number 459-19331
5/20/2021	Bills Circle Pines	Glock 44 22, serial number AFHY163
5/20/2021	Metro Pawn	Glock 19 9mm, serial number YBT114
		Glock 19 9mm, serial number FMC403
5/21/2021	Bills Robbinsdale	Smith & Wesson Shield 9 9mm, serial number JMD3016
5/21/2021	Metro Pawn	Pioneer AK47 Hellpup 7.62x39mm, serial number PAC1149857
5/21/2021	REALM	Glock 22 40 S&W, serial number BTSF753
		Glock 44 22, serial number AFFX088
		Glock 22 40 S&W, serial number BTSF754
		Glock 43 9mm, serial number ANFL774
5/22/2021	Bills Circle Pines	Ruger EC9S 9mm, serial number 456-50360
		Ruger 5 7 5.7x28, serial number 642-19475
		Smith & Wesson M&P Bodyguard 380 Auto, serial number KCL9221
5/25/2021	Modern Sportsman	Glock 17 9mm, serial number BTAR800
		Glock 23 40 S&W, serial number BTET747
		Glock 19 9mm, serial number AFHH020
		Glock 19 9mm, serial number BPPB175
5/26/2021	Modern Sportsman	Glock 17 9mm, serial number BTAR803
		Glock 43 9mm, serial number AFGL788

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Transaction Date	FFL	Firearm
		Glock 46 9mm, serial number BTAF782
		Glock 17 9mm, serial number BTBM124
		Glock 19 9mm, serial number AFHH040
5/27/2021	Bills Circle Pines	Girsan Regard MC 9mm, serial number T6368-20A18050
		Springfield XD-9 9mm, serial number BA307871
5/28/2021	Sportsman's Guide	Glock 30s 45, serial number BSMK362
		Glock 27 40, serial number BTAB035
		Glock 30 45, serial number BRZM708
5/29/2021	DK MAGS	Glock 19 9mm, serial number AFNV693
5/30/2021	Bills Circle Pines	APF AR-15 5.56 NATO, serial number AM002879
		Ruger Security 9 9mm, serial number 38453958
		Taurus G2C 9mm, serial number 1C046481

11. For each transaction completed at the different FFLs within the District of Minnesota, defendant **SARAH JEAN ELWOOD** filled out, dated, and signed an ATF Form 4473, certifying that all the information she provided is “true, correct, and complete,” including answering “yes” to Question 21.a., certifying that she was the “actual transferee/buyer” of the firearm(s) purchased, when in fact she was purchasing the firearm(s) for others, including defendant **GERYIELL LAMONT WALKER**, a/k/a “Man Man,” as arranged by defendant **JEFFREY PAUL JACKSON**, a/k/a “Jay.”

COUNT 1
(Dealing in Firearms Without a License)

12. Paragraphs 1 through 11 are re-alleged as if set forth herein.

13. From at least in or about May 2020, and continuing through on or about May 2021, in the State and District of Minnesota, the defendants,

SARAH JEAN ELWOOD, and

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JEFFREY PAUL JACKSON, a/k/a "Jay,"

aiding and abetting, and being aided and abetted by, each other, did willfully engage in the business of dealing in firearms without a license, by devoting time, attention, and labor to dealing in firearms as a regular course of trade and business with the principal objective of livelihood and profit through the repetitive purchase and resale of firearms; all in violation of Title 18, United States Code, Sections 2, 922(a)(1)(A) and 924(a)(1)(D).

COUNT 2

(Conspiracy to Make False Statements During Purchase of Firearms)

14. Paragraphs 1 through 11 are re-alleged as if set forth herein.
15. From at least in or about May 2020, and continuing through on or about May 2021, in the State and District of Minnesota, the defendants,

SARAH JEAN ELWOOD,
JEFFREY PAUL JACKSON, a/k/a "Jay,"
and
GÉRYIELL LAMONT WALKER, a/k/a "Man Man,"

knowingly and intentionally conspired with each other and with others, in connection with the acquisition of firearms from licensed dealers of firearms, to knowingly make false and fictitious oral and written statements, intended and likely to deceive such licensed dealers as to any fact material to the lawfulness of the sale of such firearms under the provisions of Chapter 44 of the United States Code, in violation of Title 18, United States Code, Section 922(a)(6).

OVERT ACTS

During and in furtherance of the conspiracy, the defendants committed the following overt acts, among others:

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16. On or about May 28, 2021, defendant **SARAH JEAN ELWOOD** purchased a Glock 30 45-caliber semiautomatic pistol, bearing serial number BRZM708, from Sportsman's Guide, an FFL in South Saint Paul, Minnesota. **ELWOOD** filled out, signed, and dated an ATF Form 4473, certifying that she was the actual transferee/buyer of the firearm, when in fact she was purchasing the firearm on behalf of another person.

17. On or about May 30, 2021, defendants **SARAH JEAN ELWOOD**, **JEFFREY PAUL JACKSON**, a/k/a "Jay," and **GERYIELL LAMONT WALKER**, a/k/a "Man Man," and others, traveled together in **ELWOOD**'s vehicle to Bills Gun Shop and Range, an FFL in Circle Pines, Anoka County, Minnesota, to purchase firearms, including a firearm for **WALKER**. **WALKER** was in possession of the Glock 30 45-caliber semiautomatic pistol, bearing serial number BRZM708, that **ELWOOD** had purchased approximately two days before, and **WALKER** had approximately \$620 cash on his person.

18. After arriving at the FFL on May 30, 2021, defendant **GERYIELL LAMONT WALKER**, a/k/a "Man Man," and another individual entered the FFL and looked at and handled various firearms and accessories within the store. After approximately 15 minutes, **WALKER** and the other individual exited the FFL without making any purchases and re-entered **ELWOOD**'s vehicle.

19. Defendant **SARAH JEAN ELWOOD** then exited her vehicle and entered the FFL and purchased three firearms, including an APF AR-15 5.56 NATO semiautomatic pistol, bearing serial number AM002879, a Ruger Security 9 9mm semiautomatic pistol, bearing serial number 38453958, and a Taurus G2C 9mm semiautomatic pistol, bearing

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serial number 1C046481, three boxes of .223-caliber ammunition, and a 100-round AR-15 high-capacity magazine, for \$1,769.60 cash, and exited the FFL. As part of the purchase transaction, **ELWOOD** filled out, signed, and dated an ATF Form 4473, certifying that she was the actual transferee/buyer of the firearms and ammunition, when in fact she was purchasing the firearms and ammunition for **WALKER** and others, as arranged by **JACKSON**.

All in violation of Title 18, United States Code, Section 371.

COUNTS 3 - 5

(Making False Statements During Purchase of Firearms)

20. Paragraphs 1 through 11 are re-alleged as if set forth herein.
21. On or about the dates alleged below, the defendants,

**SARAH JÉAN ELWOOD,
JEFFREY PAUL JACKSON, a/k/a "Jay,"
and
GERYIELL LAMONT WALKER, a/k/a "Man Man,"**

each aiding and abetting, and being aided and abetted by, one another, in connection with the acquisition of firearms from a licensed dealer, knowingly made false and fictitious oral and written statements intended and likely to deceive such licensed dealers as to any fact material to the lawfulness of the sale of such firearms under the provisions of Chapter 44 of Title 18 of the United States Code:

<u>Count</u>	<u>On or About Date</u>	<u>Firearm(s)</u>
3	May 28, 2021	(1) Glock 30s 45-caliber semiautomatic pistol, bearing serial number BSMK362 (2) Glock 27 40-caliber semiautomatic pistol, bearing serial number BTAB035

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<u>Count</u>	<u>On or About Date</u>	<u>Firearm(s)</u>
		(3) Glock 30 45-caliber semiautomatic pistol, serial number BRZM708
4	May 29, 2021	(1) Glock 19 9mm-caliber semiautomatic pistol, bearing serial number AFNV693
5	May 30, 2021	(1) APF AR-15 5.56 NATO caliber semiautomatic pistol, bearing serial number AM002879 (2) Ruger Security 9 9mm-caliber semiautomatic pistol, bearing serial number 38453958 (3) Taurus G2C 9mm-caliber semiautomatic pistol, bearing serial number 1C046481

All in violation of Title 18, United States Code, Sections 2, 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATIONS

If convicted of any Count of this Indictment, the defendants,

**SARAH JEAN ELWOOD,
JEFFREY PAUL JACKSON, a/k/a "Jay,"
and
GERYIELL LAMONT WALKER, a/k/a "Man Man,"**

shall forfeit to the United States any firearms, ammunition, magazines, and accessories, involved in or used in connection with each such violation including, but not limited to:

(1) FMK 9C1 G2 9mm, bearing serial number BTT0628, (2) Ruger LCP 380 Auto, bearing serial number 372294242, (3) Bersa Thunder 380.380 ACP, bearing serial number K05664, (4) Springfield XD9 9mm, bearing serial number AT204930, (5) Walther Arms PPS 9mm, bearing serial number AX9584, (6) Smith & Wesson M&P 15-22 22, bearing serial number DFS1108, (7) Century Arms TP9SF 9mm, bearing serial number 20BH09180, (8) Smith & Wesson Bodyguard 380 Auto, bearing serial number KFU9590, (9) Beretta Nano 9mm,

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bearing serial number NU164741, (10) Beretta Nano 9mm, bearing serial number NU164738, (11) Smith & Wesson Bodyguard 380 Auto, bearing serial number KHN5379, (12) Taurus G2C 9mm, bearing serial number ABD463393, (13) Smith & Wesson M&P 9 Shield 9mm, bearing serial number JFC3902, (14) Taurus G3C 9mm, bearing serial number ABG711104, (15) SCCY CPX-2 9mm, bearing serial number 951556, (16) Bersa BP9CC 9mm, bearing serial number K23044, (17) Sarsilmaz B6 9mm, bearing serial number T1102-17E13963, (18) Springfield XD Defender 9mm, bearing serial number BY475673, (19) Taurus Spectrum 380 Auto, bearing serial number 1F033220, (20) Taurus PT111G2A 9mm, bearing serial number ABH838724, (21) Glock 43X 9mm, bearing serial number BPEN020, (22) Taurus Spectrum 380 ACP, bearing serial number 1F024926, (23) Taurus Spectrum 380 Auto, bearing serial number 1F033065, (24) SCCY CPX-2 9mm, bearing serial number 126399, (25) Springfield XDS 9mm, bearing serial number BA181757, (26) Walther Arms CCP 9mm, bearing serial number WK189441, (27) Glock 43 9mm, bearing serial number AFLC219, (28) Taurus G3C 9mm, bearing serial number ACB590615, (29) Springfield XDM Elite 9mm, bearing serial number BA228357, (30) Ruger LCP 380 Auto, bearing serial number 372431109, (31) Ruger Security 9 9mm, bearing serial number 384-29927, (32) Heckler & Koch VP9 Tactical 9mm, bearing serial number 224-316280, (33) Girsan MC28SAT 9mm, bearing serial number T6368-20AV12009, (34) FN 503 9mm, bearing serial number CV016628, (35) Glock 44 22, bearing serial number AFGC876, (36) Ruger EC9S 9mm, bearing serial number 459-15215, (37) Smith & Wesson M&P 9 Shield Plus 9mm, bearing serial number JFY6090, (38) FN Five-Seven 5.7x28, bearing serial number 386402164, (39) Glock 19 9mm,

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bearing serial number BTNN877, (40) Ruger 5 7 5.7x28, bearing serial number 642-13405, (41) Glock 48 9mm, bearing serial number AFML592, (42) Glock 48 9mm, bearing serial number BSNU334, (43) Glock 41 45, bearing serial number AFLX128, (44) Glock 19 9mm, bearing serial number BTED415, (45) Glock 19 9mm, bearing serial number AFKM784, (46) Springfield Hellcat 9mm, bearing serial number BA241781, (47) Glock 19 9mm, bearing serial number AFMK782, (48) Taurus G2C 9mm, bearing serial number ACD780274, (49) Taurus G2C 9mm, bearing serial number ACD780224, (50) Glock 19 9mm, bearing serial number AFDP856, (51) Glock 26 9mm, bearing serial number AEZU085, (52) Glock 19 9mm, bearing serial number AFDP854, (53) Glock 22 .357 Sig, bearing serial number PTB537, (54) Glock 17 9mm, bearing serial number BTMG955, (55) Ruger 5 7 5.7x28, bearing serial number 642-12901, (56) Taurus G3 9mm, bearing serial number ACD781457, (57) Glock 26 9mm, bearing serial number AEXF244, (58) Glock 27 40, bearing serial number BTSS412, (59) Glock 23 40 S&W, bearing serial number BTHV443, (60) Glock 26 9mm, bearing serial number BSMB786, (61) SCCY CPX-2 9mm, bearing serial number C124715, (62) SCCY CPX-2 9mm, bearing serial number C124587, (63) Glock 19 9mm, bearing serial number BTCV605, (64) Glock 22 40 S&W, bearing serial number BTEN439, (65) Ruger EC9S 9mm, bearing serial number 459-19331, (66) Glock 44 22, bearing serial number AFHY163, (67) Glock 19 9mm, bearing serial number YBT114, (68) Glock 19 9mm, bearing serial number FMC403, (69) Smith & Wesson Shield 9 9mm; bearing serial number JMD3016, (70) Pioneer AK47 Hellpup 7.62x39mm, bearing serial number PAC1149857, (71) Glock 22 40 S&W, bearing serial number BTSF753, (72) Glock 44 22, bearing serial number AFFX088, (73) Glock

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22 40 S&W, bearing serial number BTSF754, (74) Glock 43 9mm, bearing serial number ANFL774, (75) Ruger EC9S 9mm, bearing serial number 456-50360, (76) Ruger 5 7 5.7x28, bearing serial number 642-19475, (77) Smith & Wesson M&P Bodyguard 380 Auto, bearing serial number KCL9221, (78) Glock 17 9mm, bearing serial number BTAR800, (79) Glock 23 40 S&W, bearing serial number BTET747, (80) Glock 19 9mm, bearing serial number AFHH020, (81) Glock 19 9mm, bearing serial number BPPB175, (82) Glock 17 9mm, bearing serial number BTAR803, (83) Glock 43 9mm, bearing serial number AFGL788, (84) Glock 46 9mm, bearing serial number BTAF782, (85) Glock 17 9mm, bearing serial number BTBM124, (86) Glock 19 9mm, bearing serial number AFHH040, (87) Girsan Regard MC 9mm, bearing serial number T6368-20A18050, (88) Springfield XD-9 9mm, bearing serial number BA307871, (89) Glock 30s 45, bearing serial number BSMK362, (90) Glock 27 40, bearing serial number BTAB035, (91) Glock 30 45, bearing serial number BRZM708, (92) Glock 19 9mm, bearing serial number AFNV693, (93) APF AR-15 5.56 NATO, bearing serial number AM002879, (94) Ruger Security 9 9mm, bearing serial number 38453958, (95) Taurus G2C 9mm, bearing serial number 1C046481, (96) 3 boxes of .223-caliber ammunition, and (97) a 100-round high-capacity AR-15 magazine, all pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON